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16 UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA

18 VERNON UNSWORTH,
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20 Plaintiff,

21 v.

22 ELON MUSK,
23

24 Defendant.
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27
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Case No. 2:18-cv-08048-SVW (JC)

**PLAINTIFF VERNON
UNSWORTH'S L.R. 16-2.7(c)
INDEX OF DEPOSITIONS
OFFERED**

Trial Date: Dec. 3, 2019

Plaintiff Vernon Unsworth, pursuant to L.R. 16-2.7(c) files, his Index of Depositions Offered:

Exhibit A – Deposition Designations for Vanessa Unsworth

Start P:L	End P:L	Objections
5:20	5:22	
6:20	10:13	
11:6	11:17	
13:18	14:21	13:18 – 14:10 – Irrelevant
17:8	17:22	17:16 – 17:22 – Irrelevant, bolstering 17:16-17:22 – Irrelevant, FRE 403, 404 (mention of child rapist and child bride)
21:11	23:6	21:11 – 22: 5 – Irrelevant, bolstering 22:16 – 23:6 – Irrelevant, bolstering, form
24:14	28:19	24:14 – 28:19 – Irrelevant, bolstering, form
32:14	32:21	32:14-32:21 – Irrelevant, FRE 403, 404 (mention of child rapist and child bride)
92:16	93:18	

Counter Designations for Vanessa Unsworth

Plaintiff reserves the right to play the below portion of this deposition at the time the witness' testimony is presented at trial.

Start P:L	End P:L	Objections
60:19	60:23	Incomplete (no question); relevance; FRE 403
73:3	74:19	Foundation; relevance; calls for speculation; FRE 403
76:6	78:15	Relevance; FRE 403

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Exhibit B – Deposition Designations for David Arnold

Start P:L	End P:L	Objections
8:11	8:13	
9:3	9:21	
10:7	10:15	
45:3	45:21	

Exhibit C - Deposition Designations for Woranan (“Tik”) Ratrawiphukkun

Start P:L	End P:L	Objections
5:22	8:15	
9:23	16:22	
17:2	18:25	18:11 – 18:25 – Irrelevant, bolstering
19:14	20:9	
23:13	24:3	
32:4	32:15	32:8-32:15 – Irrelevant, FRE 403, 404 (mentions child rapist and child bride).
33:17	33:19	
35:9	36:4	
65:6	67:23	67:6 – 11 – Hearsay

Counter Designations for Woranan (“Tik”) Ratrawiphukkun

Plaintiff reserves the right to play the below portion of this deposition at the time of the witness’ testimony is presented at trial.

Start P:L	End P:L	Objections
103:13	104:10	Foundation

Exhibit D – Deposition Designations for Steven Davis

Start P:L	End P:L	Objections
7:9	8:1	7:11 – 8:1 – Irrelevant
10:2	11:14	
13:6	15:24	
43:7	43:16	43:7 – 9 – Move to strike
49:16	50:12	Move to strike, colloquy, irrelevant
51:11	53:6	51:23 – 52:10 – Move to strike, colloquy, irrelevant 52:18 – 53:6 – Move to strike , irrelevant
67:12	70:9	70:1 – 9 – Form
81:3	88:24	81:15 – 82:21 – Move to strike, colloquy, irrelevant 84:4 – 18 – Move to strike, colloquy, irrelevant
93:10	102:12	93:14 – 15 (first sentence) – Move to strike, irrelevant 102: 8 – 12 – Move to strike, irrelevant
103:5	125:18	104:8 – 13 – Form 105: 7 – 106:8 – Form 110:14 – 112:11 – Move to strike, irrelevant 121:16 – 122:22 – Move to strike, irrelevant, calls for speculation, colloquy
129:16	143:25	129:16 – 138:16 – Irrelevant, form
149:8	152:24	150:17 – 19 – Move to strike, irrelevant
156:14	161:12	
161:19	167:23	161:19 – 162:1 – Move to strike, irrelevant
168:19	170:22	169:1 – 7 – Move to strike, irrelevant

Exhibit E – Deposition Designations for Armor Harris

Start P:L	End P:L	Objections
6:12	6:14	
8:10	10:13	
10:19	13:10	
21:23	24:8	
24:22	26:10	
27:17	28:15	
29:18	31:21	
33:5	37:13	
39:18	40:14	40:6 – 14 – Move to strike, irrelevant
58:9	59:12	
68:20	70:5	
74:22	76:19	
111:5	113:21	
121:19	129:13	
129:14	135:22	
137:19	141:14	
153:13	157:21	
163:5	163:18	

Dated: December 2, 2019

L. LIN WOOD, P.C.By: /s/L. Lin Wood

L. Lin Wood

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